

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: VALEANT PHARMACEUTICALS
INTERNATIONAL, INC. SECURITIES
LITIGATION**

THIS DOCUMENT RELATES TO:

3:18-cv-00089 (MAS) (LHG) (Hound
Partners)

Civil Action No. 15-7658

JUDGE MICHAEL A. SHIPP
JUDGE RUKHSANAH L. SINGH

JUDGE DENNIS CAVANAUGH, RET.
SPECIAL MASTER

CONSOLIDATED MOTION TO FILE UNDER SEAL

Pursuant to L. Civ. R. 5.3, Valeant Pharmaceuticals International, Inc. (“Valeant”), respectfully moves this Court for an order permitting Valeant to file under seal (i) designated portions of Valeant’s Letter to The Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.) (3:15-cv-07658 Dkt. No. 1039, “Letter”), and (ii) Exhibit D attached to the Letter.

The materials that are the subject of this motion to seal have been designated as “Confidential” pursuant to the confidentiality orders entered into in these actions. These materials are attached to the Sklar Declaration. The Confidentiality Order directs that in the event any information or documents designated as “Confidential” are filed with the Court, the filing party may petition that the confidentially-designated material be sealed in accordance with Local Civil Rule 5.3. In order to comply with the Confidentiality Order and in keeping with the designations thereunder, Valeant asks that this Court seal the materials set forth above.

Valeant seeks leave to file this consolidated motion to file under seal, pursuant to Local Civil Rule 5.3(c). Valeant conferred with Plaintiffs, who do not object to this motion. Valeant is not aware of any other party or nonparty opposing this motion.

WHEREFORE, the Valeant respectfully requests that the Court grant this Motion and enter an order (i) permitting the filing under seal of designated portions of the Letter, and (ii) permitting the filing under seal of Exhibit D attached to the Letter.

Respectfully submitted,

Dated: October 12, 2022

McCARTER & ENGLISH, LLP

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